

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST
AND BANKING CO., LTD., THE NORINCHUKIN
BANK, MITSUBISHI UFJ TRUST AND BANKING
CORPORATION, SUMITOMO MITSUI BANKING
CORPORATION, RESONA BANK, LTD., J.P.
MORGAN CHASE & CO., J.P. MORGAN CHASE
BANK, NATIONAL ASSOCIATION, J.P. MORGAN
SECURITIES PLC, MIZUHO CORPORATE BANK,
LTD., CHUO MITSUI TRUST & BANKING CO.
LTD., DEUTSCHE BANK AG, MIZUHO TRUST
AND BANKING CO., LTD., THE SHOKO CHUKIN
BANK, LTD., SHINKIN CENTRAL BANK, UBS AG,
UBS SECURITIES JAPAN LTD., THE BANK OF
YOKOHAMA, LTD., SOCIETE GENERALE SA, THE
ROYAL BANK OF SCOTLAND GROUP PLC,
ROYAL BANK OF SCOTLAND PLC, BARCLAYS
BANK PLC, CITIBANK, NA, CITIGROUP, INC.,
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL
MARKETS JAPAN, INC., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., HSBC HOLDINGS PLC, HSBC BANK PLC,;
ICAP PLC, R.P. MARTIN HOLDINGS LIMITED
AND JOHN DOE NOS. 1-50,

Defendants.

Case No. 12cv3419 (GBD)
(HBP)

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law dated August 6, 2015, the supporting Declaration of Hirotaka Uranaka dated August 5, 2015, and the Declaration of Andrew J. Calica, dated August 6, 2015, together with the exhibits annexed thereto, the undersigned, on behalf of Defendants The Bank of Tokyo-Mitsubishi UFJ, Ltd., The Bank of Yokohama, Ltd., JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Securities, plc, Mitsubishi UFJ Trust and Banking Corporation, Mizuho Corporate Bank, Ltd., The Norinchukin Bank, Shinkin Central Bank, The Shoko Chukin Bank, Ltd., Société Générale, Sumitomo Mitsui Banking Corp. and Sumitomo Mitsui Trust Bank, Ltd. will move this Court, before the Honorable Henry B. Pitman, United States Magistrate Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on such date and at such time as the Court may direct, for an Order: (1) sustaining Defendants' objections to Plaintiffs' First Request for Production of Documents directed to Defendants based on the data privacy laws of Japan, Japan's Act on the Protection of Personal Information, Act No. 57 of 2003 ("APPI"); (2) directing that Defendants be permitted to anonymize or pseudonymize personal information (as defined in the APPI), through redactions, from applicable documents prior to production; and (3) providing for such other and further relief that the Court deems just and proper.

Dated: August 6, 2015
New York, New York

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